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February 24, 2021

Via ECF and Email to: ALCarterNYSDChambers@NYSD.uscourts.gov

Hon. Andrew L. Carter, U.S.D.J.
Southern District of New York
40 Foley Square, Courtroom 1306
New York, New York 10007

Re: *Blockchain Mining Supply v. Digital Farms et ano.*, Case No. 1:18-CV-1 1099 (ALC)
Letter Motion to File Under Seal Exhibit C to Plaintiff's
Letter Motion for Informal Pre-Motion Discovery Conference (Local Civil Rule 37.2)

Dear Judge Carter,

Plaintiff Blockchain Mining Supply and Services Ltd. ("Plaintiff"), based upon this letter motion and the Chestukhin Declaration submitted concurrently herewith, respectfully moves the Court to allow Plaintiff to file under seal Exhibit C to Plaintiff's letter motion for an informal pre-motion discovery conference (filed concurrently herewith).

Plaintiff's letter motion requests an informal pre-motion conference concerning the failure of defendants Super Crypto Mining Inc. n/k/a Digital Farms Inc. ("Super Crypto") and DPW Holdings Inc. ("DPW" and, together with Super Crypto, "Defendants") to produce unredacted versions of certain responsive, non-privileged documents (collectively, the "Redacted Documents"). To aid the Court in its decision, Plaintiff attached copies of the Redacted Documents, as produced by Defendants to Plaintiff, as Exhibit C to the letter motion.

All the Redacted Documents in Exhibit C have been designated by Defendants as "Confidential" under the Protective Order jointly proposed by the parties in this action.¹ As such, Plaintiff requests that the Court allow Exhibit C to be filed under seal.

Respectfully,

A handwritten signature in black ink, appearing to read "Richard S. Mandel".

Richard S. Mandel (rsm@cll.com)
Dasha Chestukhin (dxc@cll.com)

Attorneys for Plaintiff

¹ The parties filed a Proposed Protective Order on July 7, 2020. Dkt. 43. Although the Court has not yet so-ordered the Protective Order, the parties have produced and designated documents in accordance with the Protective Order.